

DISCOVERY PLAN WORKSHEET**Tier I Pre-Settlement Discovery**

	Plaintiff's Proposal	Defendants' Proposal
Deadline for completion of Rule 26(a) initial disclosures and HIPAA-complaint records authorizations:	<u>March 10, 2016</u>	<u>March 10, 2016</u>
Completion date for Phase I Discovery as agreed upon by the parties: <i>(Reciprocal and agreed upon document production, generally not including depositions, unless otherwise agreed. No more than 30 days after Initial Conference)</i>	<u>March 25, 2016</u>	<u>April 20, 2016</u>
Status conference TBD by the court: <i>(Generally 15 days post Tier I Discovery)</i>	_____	_____

Tier II Discovery and Motion Practice

Motion to join new parties or amend the pleadings: <i>(Presumptively 15 days post status conference)</i>	<u>April 22, 2016</u>	<u>May 20, 2016</u>
First requests for production of documents and for interrogatories due by: <i>(Presumptively 15 days post joining/amending)</i>	<u>May 6, 2016</u>	<u>June 3, 2016</u>
All fact discovery completed by: <i>(Presumptively 3.5 months post first requests for documents/interrogatories)</i>	<u>August 19, 2016</u>	<u>October 28, 2016</u>
Exchange of expert reports completed by: <i>(Presumptively 30 days post fact discovery)</i>	<u>September 19, 2016</u>	<u>December 13, 2016</u>
Expert depositions completed by: <i>(Presumptively 30 days post expert reports)</i>	<u>October 19, 2016</u>	<u>January 19, 2017</u>
Final date to take first step in dispositive motion practice: <i>(Parties are directed to consult the District Judge's individual rules regarding such motion practice. Presumptively 30 days post expert depositions)</i>	<u>November 9, 2016</u>	<u>February 19, 2017</u>
<u>COMPLETION OF ALL DISCOVERY BY:</u> <i>(Note: Presumptively 9 months after Initial Conference.)</i>	<u>November 10, 2016</u>	<u>January 31, 2017</u>
Submission of joint pre-trial order:	<u>January 9, 2017</u>	<u>April 27, 2017</u>
Final Pre-Trial Conference TBD by the court:	_____	_____

Defendants believe that discovery will require more time than allotted by the presumptive dates.